

RECEIVED
FEDERAL ELECTION
COMMISSION

2011 MAR 14 AM 11:48

Mar 3, 2011

Jeff Jordan
Federal Election Commission
Washington, DC 20463

OFFICE OF GENERAL
COUNSEL

Mr. Jordan:

I am writing in response to the complaint file by Maxwell Morley MUR# 6424. In the complaint Todd Lally, candidate for the U.S. House of Representatives and his campaign treasurer, J. Ashley Cooper who will be collectively be called hereafter "The Lally Campaign", is accused of violating campaign law in its October 2010 and Preliminary 2010 reports. I believe that this complaint is without merit and should be dismissed immediately. There is NO evidence that any kind of non-disclosure or illegal activity occurred. There was an error in the filings.

Several PAC's send contributions at the closing days of the reporting period and our accounting staff did not receive their FEC information that is required by our accounting software "Complete Campaigns." This caused the PAC contributions to be designated improperly in the reports. The Lally Campaign is in compliance with complete and full disclosure of all campaign contributions.

When this error was brought to our attention on November 4, 2010, our accountant immediately corrected the mistake, amended our filings and believed that this action was appropriate and necessary to mitigate further issues with the FEC. However, we failed to advise your office in writing that the corrections were timely made and that caused a lack in communication between the FEC and the Lally Campaign.

On February 28, 2011, The Lally Campaign was notified by the FEC that they have not heard from us regarding this important matter. In conversations with our accountant, the Lally Campaign learned that he unilaterally took care of this matter in mid November and failed to inform me to notify you in writing. He believed that amending the reports would suffice, was in error. I apologize for the miscommunication and hope this will satisfactorily explain the events leading up to and following the mistakes complained.

Sincerely,


J. Ashley Cooper

11044310007